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August 8, 2013

## BY HAND DELIVERY

The Honorable Robert E. Payne
United States District Court
for the Eastern District of Virginia
701 East Broad Street
Richmond, VA 23219

RE: Tyrone Henderson, et al. v. CoreLogic, Inc., et al.

Civil Action No. 3:12ev97 (REP)

## Dear Judge Payne:

As reflected in an Order previously entered by the Court (Dkt. No. 48), the parties were to agree on a protocol to govern discovery of an electronic database in the above captioned action. In particular, the Order stated as follows: "The parties agree, and the Court orders, that in order to protect the security of the database at issue that discovery of that database shall be produced in the format agreed between the parties and subject to additional technical, protocols and certifications, to be addressed by the parties in an additional Order that is to be tendered to the Court forthwith."

The enclosed draft Order for your endorsement provides those additional technical protocols and certifications with respect to the database, which has previously been delivered to Plaintiffs. Please let me know if you have any questions.

Sincerely,

Timothy J. St. George

**Enclosure** 

cc: Matthew Erausquin, Esq. (via email)